

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	Chapter 11
JOANN INC., et al.,	Case No. 25-10068 (CTG) (Jointly Administered)
Debtors. ¹	Objection Deadline: June 13, 2025 at 4:00 p.m. (ET) Hearing Date: July 10, 2025 at 10:00 a.m. (ET)
	Re: DI 1016

**MYRTLE BEACH FARMS COMPANY, INC.’S MOTION TO FILE UNDER SEAL
CERTAIN CONFIDENTIAL INFORMATION IN ITS OBJECTION TO DEBTORS’
AMENDED FIRST NOTICE OF ASSUMPTION AND ASSIGNMENT OF CERTAIN
EXECUTORY CONTRACTS AND/OR UNEXPIRED LEASES**

Myrtle Beach Farms Company, Inc. (“Landlord”) hereby moves (the “Motion”) and respectfully states as follows:

RELIEF REQUESTED

1. By the Motion, Landlord seeks entry of an order, substantially in the form attached hereto as Exhibit A (the “Proposed Order”), authorizing Landlord to file under seal the Confidential Information contained in Exhibits A and B of its *Objection to Debtors’ Amended First Notice of Assumption and Assignment of Certain Executory Contracts and/or Unexpired Leases* [D.I. 1016] (the “Objection”).

JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the District of Delaware (the “Court”) has jurisdiction to consider the Motion pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended*

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors’ mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

Standing Order of Reference from the United States District Court for the District of Delaware, dated February 29, 2012. This is a core proceeding under 28 U.S.C. § 157(b). Venue of this case and the Motion in this District is proper under 28 U.S.C. §§ 1408 and 1409.

2. The legal predicates for the relief requested herein are sections 105(a), 107, and Rule 9018 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rules 1001-1(c) and 9018-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”).

BACKGROUND

3. On January 15, 2025, the above-captioned debtors and debtors in possession (the “Debtors”) commenced these chapter 11 cases by filing their voluntary petitions for relief under chapter 11 of Title 11 of the United States Code (the “Bankruptcy Code”).

4. Landlord, as landlord, and Debtor Joann Stores, LLC (the “Debtor”), as tenant, are parties to that certain Store Lease dated as of January 28, 2022 for the property located at 1120 Seaboard St., Myrtle Beach, South Carolina (designated by the Debtors as Store #2566 on the Designation Notice).

5. On May 29, 2025, Landlord filed its Objection to Debtors’ Amended First Notice of Assumption and Assignment of Certain Executory Contracts and/or Unexpired Leases [D.I 1016]. Exhibits A and B to the Objection includes certain commercially sensitive information (the “Confidential Information”) that the Landlord requests remain confidential and not made public.

6. Accordingly, Landlord has filed this Motion seeking authority to (i) file the Confidential Information under seal and (ii) file a version of Exhibits A and B redacting the Confidential Information.

BASIS FOR RELIEF REQUESTED

7. Landlord therefore respectfully requests that Exhibits A and B be redacted from the Bankruptcy Documents pursuant to Bankruptcy Code section 107(b), which provides, in relevant part, that:

On request of a party in interest, the bankruptcy court shall, and on the bankruptcy court's own motion, the bankruptcy court may—

(1) protect an entity with respect to a trade secret or confidential research, development, or commercial information

11 U.S.C. § 107(b(1); *see also* Fed. R. Bankr. 9018 (allowing a bankruptcy court to protect the estate or any entity in respect of a trade secret or other confidential research, development, or commercial information); and Local Rule 9018-1(d)(iii).

8. Although maintaining confidentiality with respect to the financial information in Exhibits A and B is essential, Landlord understands that it is important for the Court to have a complete and unredacted record with respect to certain documents, including Exhibits A and B to the Objection. Accordingly, Landlord proposes that it be permitted to file the unredacted Exhibits A and B under seal. In addition, Landlord proposes to provide an unredacted version of Exhibits A and B to the Court, the U.S. Trustee, the Debtors, and other parties-in-interest that obtain, after notice and a hearing, authorization from this Court.

9. Absent the relief requested herein, the Landlord may disclose commercially sensitive information. Accordingly, Landlord believes that the relief requested herein appropriately balances the need to maintain confidential and sensitive business information with the need for adequate disclosure under the Bankruptcy Code.

10. Pursuant to Local Rule 9018-1(d), undersigned counsel hereby certifies that the Debtor has represented that it is the holder of Confidentiality Rights as defined by Local Rule

9018-1(d)(iii). Counsel to Landlord and the Reorganized Debtor conferred in good faith and agree the Confidential Information should remain under seal. As such, Landlord has filed the redacted version of Exhibits A and B under notice consistent with Local Rule 9018-1(d)(ii). *See* Docket No. 2293.

NOTICE AND NO PRIOR REQUEST

11. Landlord will provide notice of the Motion to: (a) the Office of the United States Trustee for the District of Delaware (b) Counsel for Debtor; and (c) all parties entitled to notice pursuant to Local Rule 2002-1(b). Landlord submits that no other or further notice is required.

12. No previous request for the relief sought herein has been made to this or any other court.

CONCLUSION

WHEREFORE, Landlord respectfully requests that the Court enter the Proposed Order, substantially in the form attached hereto as **Exhibit A**, granting the relief requested herein and such other and further relief as may be just and proper.

Dated: May 30, 2025
Wilmington, Delaware

GELLERT SEITZ BUSENKELL & BROWN, LLC

/s/ Michael Busenkell

Michael Busenkell (DE 3933)
1201 N. Orange Street, Suite 300
Wilmington, DE 19801
Telephone: 302-425-5812
Facsimile: 302-425-5814
Email: mbusenkel@gsbblaw.com

Counsel to Myrtle Beach Farms Company, Inc.